

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR PRESIDENT,  
INC., *et al.*,

Plaintiffs,

v.

No. 2:20-cv-00966-NR

KATHY BOOCKVAR, in her capacity as  
Secretary of the Commonwealth of  
Pennsylvania, *et al.*,

Defendants,

**DECLARATION OF SUZANNE ALMEIDA**

Pursuant to 28 U.S.C. § 1746, I, Suzanne Almeida, hereby declare as follows:

1. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify.
3. I am the Interim Executive Director of Common Cause Pennsylvania. I have served in that role since March 7, 2020.
4. I also serve as Common Cause Redistricting and Representation Counsel.
5. Prior to joining Common Cause, I was the Executive Director of the League of Women Voters of Pennsylvania.
6. I have a law degree from the James E. Beasley School of Law at Temple University and an undergraduate degree from George Fox University.

7. Common Cause is one of the nation's leading grassroots democracy-focused organizations and has over 1.2 million members nationwide and chapters in 35 states, including approximately 36,000 members and supporters in Pennsylvania.

8. Since 1970, Common Cause has been dedicated to the promotion and protection of the democratic process. It works to create open, honest, and accountable government that serves the public interest; to promote equal rights, opportunity and representation for all; and to empower all people to make their voices heard in the political process.

9. Common Cause of Pennsylvania's principal place of business is located in Harrisburg.

10. Common Cause has approximately 36,000 members in Pennsylvania. These members live in all of the 67 counties in Pennsylvania.

11. Common Cause works in the areas of voter access advocacy, election protection, voter education, advocacy, outreach, get out the vote, and grassroots mobilization around voting rights.

12. Common Cause seeks to increase the level of voter registration and voter participation in Pennsylvania elections.

13. Common Cause works to educate voters in underserved minority communities about the voting process and how to participate in elections, including by mail or absentee ballot.

14. Common Cause's members include voters at risk of not being able to vote by mail or absentee ballot if mail ballot drop boxes are eliminated as a result of this litigation, which could leave county boards of elections' offices as the only place at which voters may deliver mail or absentee ballots in person.

15. Some of these affected members of Common Cause will be seniors or have compromised immune systems, or have family members who are seniors or have compromised immune systems. For these affected members, voting in person may not be a realistic option.

16. For the June 2020 primary election, Common Cause's voter education efforts included informing members of the public about the availability and locations of mail ballot drop boxes on its website, on social media, and through outreach to traditional media. Common Cause also responded to inquiries from voters both via the nonpartisan Election Protection hotline and directly to Common Cause via email/telephone. In those communications, Common Cause staff provided information about where the drop boxes were located and how to use them. For example, Common Cause staff answered logistical questions, including questions about the dates and times of availability, relating to mobile drop boxes in Philadelphia.

17. If mail ballot drop boxes are eliminated, Common Cause will not only have to change its messaging to voters about the availability of mail ballot drop boxes, but will also have to divert considerable resources from its ongoing election protection, advocacy, and get out the vote efforts to educate and assist eligible voters. Many of these voters will not be able to vote in person and will not be able to travel to a county board of elections office to drop it off in person but they will nonetheless want to vote by mail or absentee ballot.

18. Similarly, if mail ballot drop boxes are eliminated, Common Cause will have to divert its resources to educate voters about changes to the mail voting process, and would have to respond to questions from voters who used mail ballot drop boxes for the June primary election in places like Philadelphia or Allegheny Counties and will be confused by the fact that they are no longer available for the November general election. Given this likely confusion, Common Cause will need to begin educating voters immediately about the change in voting procedures and their now limited options to return a voted mail in ballot. Common Cause will also have to divert resources to create systems to ensure that voters who are not able to mail their vote by mail or absentee ballot have the information and resources to submit their voted ballot at the relevant

county elections office. Additionally, Common Cause will need to divert resources to work with county elections offices to ensure that the offices are set up to receive the likely influx of voted mail-in and absentee ballots that will occur if drop boxes are eliminated.

19. Common Cause has an interest in preventing the disenfranchisement of eligible voters who wish to vote by mail or absentee ballot in the midst of the COVID-19 pandemic, including thousands of its members and voters it may have assisted in navigating the registration process. Common Cause also has an interest in assisting voters with the process of requesting a mail-in or absentee ballot and the process of returning a voted mail-in or absentee ballot.

20. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of July, 2020, in Harrisburg, Pennsylvania.

A handwritten signature in cursive script that reads "Suzanne Almeida".

Suzanne Almeida